

**Comments on the 779 DOP, 10/10/97
Timothy Howell, DOE**

COMMENT

- 1.) This version of the draft DOP provides a more focused discussion of reasonable alternatives, however, there is no discussion of the "No Action" alternative and more details are needed on the alternatives listed (see specific comments on the attached draft). This version of the DOP also provides more focus on what specifically the proposed action is, but there appears to be some indecision over whether some technologies will or will not be used. In cases where the specific technology to be employed is still in doubt, it would be beneficial to include these technologies in the proposed action so the impact analysis can be as complete as possible. It is more prudent to have a technology evaluated and not used then to retrofit in a technology at a later date when the relative impacts have not been assessed.

RESPONSE

More detail has been added to Section 9.4.2, Proposed Action and Alternatives, regarding the "No Action" alternative and the additional identified alternatives. The available and potential technologies are discussed in Appendix A.

COMMENT

- 2.) Reference Section 1.0, Purpose: Recommend deleting 1.0.1 and 1.0.2; recommend moving 1.0.3 to 9.4.1, page 81, as indicated by my notes on enclosed draft; and move 1.0.4 to follow the introduction.

RESPONSE

At your request, Sections 1.0.1 and 1.0.2 have been deleted. Section 1.1 of the September 1997 DOP was moved to the front of the document followed by Section 1.0.3. Section 1.0.3, Nature of Contamination, was placed at the front of the document in response to your comment on page 2 of the 779 DOP.

COMMENT

- 3.) Reference all discussions of ventilation systems: It is unclear what the proposed decommissioning activity relates to. If the phrase ventilation system refers to the ducts or the holdup in the duct work, then there may need to be further programmatic discussions over what is deactivation and what is decommissioning.

RESPONSE

Further clarification of 779 Cluster related ventilation activities has been added to Section 3.2.3, Standard Work Steps, Ventilation System Removal. The 779 Cluster deactivation is complete.

COMMENT

- 4.) Reference all discussion on PCBs: Does the Site have an EPA approved sampling plan for paint containing PCBs? It is unclear in the DOP what sampling plan the Site plans to use with respect to paint containing PCBs. It is my understanding that Melanie Pearson is the EH POC at DOE HQ and that Tony Baining is the TSCA Group POC at EPA HQ. Also, I have made specific comments relative to the disposal of PCB containing paints.

RESPONSE

The Site does not have an EPA approved sampling plan for paint PCBs. An IWCP is being developed for the 779 Cluster and it will address the method for sampling paint that may contain PCBs.

ADMIN RECORD

B779-A-000185

COMMENT

- 5.) Reference all discussions of "excess chemicals" and "idle equipment": Note that the Site now has two new consent orders which address these two topics. The DOP should be updated to reflect the requirements of these two consent orders. Also, the correct reference is "waste chemicals" and not "excess chemicals." Furthermore, please note that the activities associated with the waste chemical and idle equipment consent orders are technically neither decommissioning nor deactivation activities. Items deferred from the consent orders to decommissioning, however, are technically decommissioning activities and will be covered under the DOP.

RESPONSE

The project will manage idle equipment and waste chemicals in accordance with Compliance Orders on Consent 97-08-21-01 and 97-08-21-02. Reference to these orders has been added to the 779 Cluster DOP. Although the activities associated with waste chemicals and idle equipment are neither a decommissioning or deactivation activity, waste chemicals and idle equipment residing in the building will be addressed by project personnel in accordance with the applicable Compliance Orders on Consent.

The reference to excess chemicals has been changed to "waste chemicals".

COMMENT

- 6.) Reference 2.0: Recommend deletion of 2.0 through Figure 2-1. This section deals wholly with internal Site procedures and as such is not appropriate for inclusion into a document being approved by the regulators.

RESPONSE

Section 2.0, Organization, was included at the request of the LRA. Section 2.0 is meant to identify the basic organization structure for this project.

COMMENT

- 7.) References to residual levels of radionuclides in the soil: I am unaware of any negotiations on-going with the Department or the Site regarding residual levels of radionuclide activity in soils. The soil action level is established for what the minimum level of radionuclide that can be left in the soil once a building has been reduced to rubble. This action level does not establish the degree to which a building must be cleaned before it is demolished. I am, nonetheless, mindful, that the Rocky Flats Citizen's Advisory Board has asked for an independent review of soil action levels.

RESPONSE

The soil action level has not been applied to the degree to which the 779 Cluster facilities must be cleaned prior to demolition. Section 5.1, Radiological, has been rewritten to better define 779 Cluster facility cleanup criteria and to ensure that these levels are not confused with soil cleanup action levels.

REVIEW COMMENT SHEET

Page

Comment/Disposition

Comment

Fac Disp Wkg Grp

2nd para, change date from Oct 6, 1997 to Oct 13, 1997.

Disposition

In order to support the December timeline for implementation of the DOP, the October 6 date was chosen.

Comment

Title Page

Schedules in Attachment 1 should not be part of the DOP submitted to regulator for "approval."

Disposition

During the scoping process for the 779 Cluster Project, the LRA requested that a summary level schedule be included in the DOP such that they could understand the flow of work. The schedule was included for the purpose of clarification rather than for LRA approval.

Comment

Page 1, 2

Delete Pg 1 and start with Introduction, 1.1. Have proposed action (Interim and Nature of Contamination, follow after introduction)

Disposition

This modification has been performed.

Comment

Page 4

2nd para under PCBs, Does RFETS have an EPA, Reg VIII approved PCB-paint sampling plan? There needs to be coord with Melanie Person at EA - EPA POC at EPA HQ is Tony Baining, TSCA Group." " $> 0 \leq 50$ ppm is the concern for disposal of debris.

Disposition

Reference the response to question 4 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

4th para under Contaminant Location, "Ventilation Systems": Are we doing this as deactivation or decommissioning. RFCA doesn't care if this deactivation.

Disposition

All activities identified in the document will be performed as decommissioning unless stated otherwise.

Comment

5th para under PCBs, characterization should be done before we start work, how else can you plan the work?

Comment - DOP, 10/20/97

Disposition

Characterization is an ongoing process and not a single event; this process is described in Section 4.0, Facility Characterization. As layers of the facilities are removed or hazards are removed from the facility, characterization will be performed to ensure that cleanup criteria are met, hazards are removed, and PPE is commensurate with the task at hand.

Comment

Page 5, 1.1

Line 12, after DPMP add, "A site-wide management and project planning document"

Disposition

Incorporated

Comment

2nd para, "seven facilities," Check with Bill Fitch -- done '97 we changed the list.

Disposition

The number of facilities that require a DOP is 6. This correction has been made.

Comment

3rd para change to: "Prior to the start of the decommissioning activities, the 779 Cluster will go through a deactivation process as described in DPMP."

Disposition

Incorporated

Comment

Page 6, last para

Spell out NEPA, first use

Disposition

NEPA has been spelled out.

Comment

Page 12-15, 2.2

Delete para 2.2, it is an internal Site Management function and should not be part of a RFCA decision document; can reference the appropriate parts of the DFMP for further information.

Disposition

Reference the response to question 6 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

Page 20, Para 3.1.2

Lines 3-5 starting with "Note that these...", Confusing, not clear why this is here and what it means; can sentence be deleted?

Disposition

The sentence was deleted.

Comment - DOP, 10/20/97

Comment

Page 20, 3.1.2

Last line under Rm 126, What about PCB paint?

Disposition

The potential for PCB paint is a global issue within the 779 Cluster and will be addressed through representative sampling. A Sampling and Analysis Plan is in the process of being developed to identify how representative sampling for PCBs in paint will be performed.

Comment

Page 22

4th line, "levels of contamination," what type? Hazardous or Radiological?

Disposition

Clarification has been provided.

Comment

Page 22

GB953: "glovebox never used," if never used, this may be removed as regular equipment if no contamination; we should have language which explains this concept--if clean they're not regulated under DOP or RFCA.

Disposition

Clarification has been provided.

Comment

8th para, "Two of which may be internally..." same comment as above.
Rm 134, same comment as above.

Disposition

Clarification has been provided.

Comment

Page 37, Table 3.2

"Ventilation," Is this a deactivation or decommissioning activity? We need Site-wide Policy discussion and consistency.

Disposition

Removal of the ventilation systems associated with the 779 Cluster is a decommission activity.

Comment

Page 39, Para 3.2.3

4th para, shouldn't you have similar paragraph for PCB and Be since they are not CERCLA per se either.

Disposition

A bullet has been added for both PCBs and Be in this section.

Comment

Page 40

1st para, "remove any loose including asbestos," doesn't make sense.

Disposition

This sentence has been rewritten.

Comment

Page 42, Para 4.1.1

Remove "Scoping" from title and all references in paragraphs; don't use scoping since it has specific NEPA meaning--try Pre-characterization.

Disposition

Scoping characterization is the appropriate nomenclature.

Comment

Page 43, Para 4.1.3

4th para, first sentence. Very confusing sentence when using phase implementation.

Disposition

This sentence has been rewritten.

Comment

Page 43, Para 4.1.5

Entire para, especially "independent party", check with Bill Fitch, don't think this is going to be DOE policy.

Disposition

The independent verification process is identified in MARSSIM. An impartial party (or independent party) may perform this confirmation in accordance with MARSSIM.

Comment

Page 43, Para 4.2

Para 1., add after "facilities will be evaluated for contamination." (i.e., PCBs and radionuclides)

Disposition

Incorporated as requested.

Comment

Page 44

1st para, "Because the chemicals have been...", is this not actually going to be done under the Consent Order?

Disposition

Reference the response to question 5 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

2nd para, "Further sampling and asbestos...", don't you want to say how it will be removed--this sounds like we just stop and leave it alone and never remove it.

Disposition

The Asbestos Abatement Plan, in conjunction with an IWCP, will describe how asbestos containing material will be removed.

Comment

Page 44

Paras 5&6, redundant

Disposition

The redundancy has been removed.

Comment

Para 7, is it not more accurate to say as universal waste under RCRA?

Disposition

Not all fluorescent lights and ballasts will be disposed of as universal waste under RCRA; only those bulbs that are characterized as hazardous will be addressed as universal and only those ballasts identified as PCB containing will be addressed as TSCA regulated.

Comment

Contaminate - Location, "Ventilation Systems..." is this deactivation?

Disposition

Decontamination of the ventilation systems will be performed as a decommissioning activity.

Comment

Page 45, Para 4.4

Repeat of my July 9, 1997 comments, recommend we follow State regulation for inspection and removal.

Disposition

The asbestos abatement will be performed in accordance with Colorado Regulation 8.

Comment

Page 46, Para 4.7

PCB paint needs addressing, see comment on Page 4.

Disposition

Reference the response to question 4 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

Page 47, PCBs

See comments of Page 4

Disposition

Reference the response to question 4 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

Page 47, Para 5.1

See same comments for July 9th opinion, (Pg 45, Para 4.4).

Comment - DOP, 10/20/97

Disposition

Section 5.1 has been rewritten to address your concerns.

Comment

2nd para, "residual radiological contamination levels," do you mean the demolition debris? If so, then say so. We don't have to clean to 15/85, we just can't leave debris above 15/85! Sentence, "When approved, the RFETS BRCS..." OCC knows of no such negotiation going on.

Disposition

Section 5.1 has been rewritten to address your concerns.

Comment

3rd para, change "cleanup" to "15/85 mrem." Sentence, "Equipment and building structures...." is not true.

Disposition

Section 5.1 has been rewritten to address your concerns.

Comment

Page 51, Para 5.5

PCB Paint?

Disposition

The release for solid material containing PCBs is less than 50 ppm.

Comment

Page 64, Para 8.1

Address storage and disposal.

Disposition

Storage and disposal of waste generated from the 779 Cluster Project is addressed in Sections 8 and 9. Additional detail will be addressed in the project specific waste management plan.

Comment

Page 64, Para 8.2

Address storage and disposal. Statement, "free release condition," give specific citation.

Disposition

This section has been reworded.

Comment

Page 64, Para 8.3 & 8.4

Address storage and disposal.

Disposition

These sections have been reworded.

Comment

Page 67, Para 8.10

Entire paragraph and specifically sentence, "Any remaining idle equipment..." needs to reflect new Consent Order requirement and management plans.

Disposition

This section has been reworded to reference the Compliance Order on Consent for Idle Equipment.

Comment

Page 68

Need to also address the new Consent Order on Waste Chemicals by Cross Reference. Para 8.12 is missing from the July version of this DOP--What happened to it.

Disposition

This section has been reworded to reference the Compliance Order on Consent for Waste Chemicals.

Comment

Page 75, Para 9.0

3rd para, What is the IA DOP - never heard of it?

Disposition

The reference should have been IA IM/IRA. This error has been corrected.

Comment

Para 9.1, move 2nd para before first para. Need to start paragraph with real word.

Disposition

Corrected

Comment

Para 9.1, former first para, change sentence to end, "...was not completed." and leave out "because an independent professional...."

Disposition

This sentence was removed.

Comment

Para 9.1.1, last sentence, check with Flo Phillips. DOE discussion point, recommend not classifying, risk getting people confused, better if merely refer to the Permit Section and leave it at that..

Disposition

This sentence has been revised to say "The following discussion is not intended to modify the RCRA permit language."

Comment

Page 77, Para 9.2

2nd para, first sentence, Why is this sentence needed?

Disposition

This sentence has been modified as follows: " Pursuant to RFCA ¶ 16.6, the procedural requirements to obtain state, federal or local permits are waived as long as the substantive requirements that would have been imposed in the permit are identified (RFCA ¶ 17c)."

Comment

Page 78

Why is there no discussion of the CAMUs?

Disposition

The only approved CAMU is scheduled for construction in 2003 and will not be constructed in time to meet project needs.

Comment

Page 78, Para 9.2.4

last sentence of page, remove spelling of acronym CERCLA.

Disposition

Removed

Comment

Page 79, Para 9.2.7

PCB paint?

Disposition

Reference the response to question 4 of the DOE memorandum from T. Howell to D. Nickless, dated October 6, 1997.

Comment

Page 80, Para 9.2.9

Will soil excavation be deferred to ER phase?

Disposition

Yes

Comment

Page 80, Para 9.4.1

Need to cite specific actions of the CID that you are referring to. To the extent B779 Cluster differs from the generic discussion in CID, you need to cover these differences in DOP.

Disposition

Section 9.4.1 has been rewritten.

Comment

The NEPA values done for the Aug/Sep 1997 modification to Mound Site Plume IM/IRA are an excellent model to use with respect to what OCC would expect of the DOP.

Disposition

Comment

3rd line, Change "impact analysis for," to "examination of the"

Disposition

Section 9.4.1 has been rewritten.

Comment

4th line, change "Rocky Flats Ten Year Plan" to "accelerating cleanup: Focus 2006 Planning Document."

Disposition

This line has been changed as requested.

Comment

Page 81, Alt 1

Change "CDPHE," to "RFCA Lead Regulatory Agency (LRA) for the Industrial Area."

Disposition

The entire section has been rewritten.

Comment

Need a little more description, (a) following deactivation, (b) add the detail that is currently in Para 1.0.3.

Disposition

The entire section has been rewritten.

Comment

Page 81, Alt 2

Does this include deactivation. Will this include equipment removal for recycle (e.g., furniture, tools, equipment)?

Disposition

The entire section has been rewritten.

Comment

After "their current configuration" add short description what this means.

Disposition

The entire section has been rewritten.

Comment

Page 81, Alt 3

Will this include equipment removal (e.g., furniture, tools, equipment)?

Disposition

This alternative could involve removal of furniture, tools and equipment based upon the definition of an alternative use by the SURB.

Comment

After "their current configuration" add a short description of what this means. Reference "change their mission in support of the RFETS," needs further information, don't know what this means.

Disposition

Alternative three has been rewritten.

Comment

Page 81, Eval of Alt

1st para Alt 1: add: supports the vision; supports getting off nor faster

Disposition

The entire section has been rewritten.

Comment

3rd para Alt 2: more detail needed

Disposition

The entire section has been rewritten and more detail has been incorporated.

Comment

4th para Alt 3: "....does not result in any detrimental..." can't tell if this is so or not since there is not enough detail as to what this alternative entails.

Disposition

The entire section has been rewritten and more detail has been incorporated.

Comment

5th para Alt 3: And??? There are (+) and (-) for each alternative--should include pluses and minuses for all three alternatives.

Disposition

The entire section has been rewritten and more detail has been incorporated.

Comment

Page 82, Para 9.4.3

2nd para: Insert "may" into the following sentence: "The proposed decommissioning activities for the 779 Cluster may..."

Disposition

Incorporated as requested.

Comment

3rd para, last sentence: "Demolition of the Cluster is not..." direct conflict with Para 9.4.10, Page 88. Insert "the" in last sentence before "visual quality"

Disposition

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The inconsistency has been corrected.

"The " has been inserted.

Comment

4th para: delete "this" from sentence, "Therefore, this discussion..."

Disposition

Incorporated as requested.

Comment

Page 82

Cost benefit analysis needed (see the NEPA values for Mound Site Plume IM/IRA). More detail in cumulative Impacts Sections needed (9.4.10)

Disposition

Relative cost has been added to the alternative analysis.

Comment

Page 83, Geo & Soils

Regarding "localized landslides," do we really mean landslide or something less severe, like subsidence or earth movements.

Disposition

This section has been reworded and the reference to localized landslides has been removed.

Comment

Page 84, Water Qual

Four references in these paragraphs to "storm water runoff" appear incongruent.

Disposition

Corrected

Comment

3rd para: reference to "existing Site procedures." give cite for the procedure.

Disposition

All relevant procedures will be cited in the IWCPs and project specific planning documents.

Comment

6th para: We really should decide if technique will be used or not before sending DOP out for review, comment, and approval. Also, the relative results of the technique can be discussed in the alternative section--better to evaluate for impacts and then later not need to use it.

Disposition

The specific approved D&D technique will be identified in the work planning stage for each activity to be performed. Where applicable alternative impacts will be evaluated for

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specific techniques. The project does not want to restrict itself to using new techniques as they become available.

Comment

6th para: change first sentence to read: "Among the techniques that may be used for decontamination of the 779 Cluster...."

Disposition

Incorporated

Comment

Page 86, 9.4.5

Address impacts if any to PMJ mouse.

Disposition

Addressed

Comment

Page 86, 9.4.7

last sentence, ...is discussed in a subsequent section." cite that Section for cross-reference.

Disposition

Corrected

Comment

Page 87, 9.4.7

2nd para: Should state what record is being developed (e.g., photos). Needs updating in light of the completed negotiations and comprehensive plan we now have with SHPO.

Disposition

This statement has been updated to reflect current conditions.

Comment

How are we meeting McKinny Act requirements? Needs to be included.

Disposition

McKinny Act information has been incorporated.

Comment

Page 88, 9.4.10

2nd para: first sentence, if more is needed--then we should do it now.

Disposition

This sentence has been deleted.

Comment

Update to indicate future use of offsite sanitary landfill.
delete last sentence, "In 1994, DOE..."

Disposition

3rd para: "Also, the collective effect of removing...) Conflicts with Para 9.4.3, page 82. We can reference and/or include material from the CID regarding cumulative impacts of generic buildings.

Page 88, 9.4.11

Add PMJ mouse interim policy.

Disposition

Incorporated.

Comment

Page 89

1st para, "No modifications of or damage to facilities..." update this paragraph

Disposition

Updated.

Comment

Page 89, 9.4.13

"Very good!"

Disposition

Thank you.

Comment

Page 89, 9.4.14

Add at the end of the para: "Accordingly, there are no anticipated irreversible and irretrievable commitments of resources as a result of the proposed action."

Disposition

Added.

Comment

Page 90

Bill Fitch needs to check--needs to be consistent in substance and format to the PAM for Bldg. 123.

Disposition

The ARAR section is consistent with the Building 123 PAM.

Comment

Page 92

Is there value added to have paragraph 10? Not sure it is needed legally.

Disposition

This paragraph only serves as an introduction and is not legally necessary.

Comment

Para 10.2, 2nd para: Change to read, 'The QAP is applied to the specific...'

Comment - DOP, 10/20/97

Disposition

This will be changed in the next revision.

Comments on 779 DOP, 10/6/97
Chris Gilbreath, CDPHE

COMMENT

- 1.) p. 3,51, Section 5.3: Utilizing the 25 μ /ft² housecleaning action limit for beryllium (which was developed in the 60's) may not be appropriate. The DOP or supplemental documents must elaborate and clearly identify how the value was derived and its applicability. Also, what does the "zero" added beryllium standard mean?

RESPONSE

The first referenced section has been revised to include the source of the 25 μ g/ft².

A standard has been recommended by KH of zero for free release of equipment used in the processing of beryllium; this is what is referred to as the "zero" added beryllium standard. To date, this release criteria is only a recommendation.

COMMENT

- 2.) p. 35, Section 3.2: Documents to be developed include demolition plans, lead abatement plans and other significant plans. A section should be added (somewhere in the DOP) to include the schedule for development of these and other documents, the submittal dates to the LRA and whether or not they require LRA approval (e.g., the demolition should be submitted to CDPHE for approval at least 30 days prior to implementation).

RESPONSE

Those documents that require LRA approval are identified in the RFCA; specific to the 779 Cluster, they are the IM/IRA (DOP) documentation and the RLCR. Support documentation subject to LRA approval includes SAPs, Technical Memorandas, Closeout Reports, and Treatability Study Reports. Any document necessary to execute the accelerated action such as the HASP, AHAs and Engineering Orders and Integrated Work Control Packages are not subject to either agency or public review.

The project places significant value on document review and comment provided by CDPHE. Documents requested by CDPHE will be provided and CDPHE will be included in the review cycle for the documents requested in this comment documentation.

Planning documents will be identified in the schedule and those requiring LRA approval will be specifically identified in the DOP.

COMMENT

- 3.) p. 39, Section 3.2.2: Engineering Package/IWCP Development similar to previous comment, identify the time frame for development of the documents and LRA review and approval (if necessary). Further discussion may be warranted to resolve which of these documents require LRA approval.

RESPONSE

We expect to generate approximately 50 Engineering Orders and 50 IWCPs to complete the project. These packages will be generated throughout the project's life. Some of the packages have been prepared and others are currently being developed. These documents do not need LRA approval but they will be made available for LRA review and comment. The time frames for development of the engineering packages and IWCPs are identified in the schedule located in Attachment 1 of the 779 Cluster DOP.

COMMENT

- 4.) p. 40, Section 3.2.3: Why was piping and equipment left to be drained and LO/TO by decommissioning personnel? I don't necessarily disagree with the approach but it does contradict with the activities considered to be part of deactivation in the draft DPP (9/97).

RESPONSE

The deactivation process removes high risk elements from the facility and therefore will drain many of the systems. Some of the equipment and systems are required to be maintained in service and handled in decommissioning. The DPP may require revision to allow for these evolutions as part of the decommissioning process.

COMMENT

- 5.) p.42, Section 4.1.2: What is the status of the RLCR? Recommend including submittal of RLCR with the DOP to the LRA.

RESPONSE

A draft RLCR is undergoing project review. The document is scheduled for transmittal to K-H on Nov. 3, 1997 and will then be transmitted through DOE to CDPHE.

COMMENT

- 6.) p.44, Section 4.2, #2: Clearly define what agency/group is responsible in the event a chemical is found. Also, the DOP should clearly state that these chemicals can only be handled by the designated agency/groups technical expert.

RESPONSE

In the event that a chemical is found within the 779 Cluster, the Chemical Control Administrator will be contacted. The chemical will then be addressed in compliance with the Compliance Order on Consent, 97-08-21-02, regarding waste chemicals. The SSOC Chemical Control Administrator assigned to the 779 Cluster is Fernando Payan.

Section 4.2 has been enhanced to include this information.

COMMENT

- 7.) p. 44,46, 47, Sections 4.2, #4, 4.6 and 5.0: Lead characterization/sampling/disposal- has the Site developed an EPA or CDPHE approved procedure or computer model to determine leachability. I'm unaware of an approved procedure. Define when TCLP is necessary. If, as identified in §4.6, it is assumed that all painted surfaces are lead bearing unless proven otherwise, development of an acceptable procedure or model to determine leachability is vital. Without this approved procedure/model, disposal costs may become very significant.

RESPONSE

The last sentence on page 44, Section 4.2 has been revised to state "A Sampling and Analysis Plan (SAP) that addresses lead characterization will be developed and submitted to the LRA for review and approval. This plan will identify the 779 Cluster approach to evaluating lead paint coated materials. Representative sampling will be performed to characterize and compliantly dispose of lead paint contaminated debris.

In accordance with the RFCA Implementation Guidance Document, August 1997, the SAP will be prepared in parallel with the DOP and comment resolution period. The SAP will identify the sampling methodology.

Section 4.6, page 46, was replaced with the following:

Lead shielding and lead based paint are present in the 779 Cluster facilities. A SAP will be developed and submitted the LRA for comment and approval. This plan will provide detail on how sampling will be performed on painted materials (walls, concrete, door jams) within the facilities. The results of this sampling will determine the regulatory requirements for management and disposal of these materials.

The following information was added to Section 5.0, page 47:

In accordance with the 779 Cluster Waste Management Plan, any remediation waste that is characterized as D008 (i.e., lead bricks or sheeting, lead-based painted debris, and lead paint chips) will be managed in accordance with all hazardous remediation waste related ARARs.

COMMENT

- 8.) p. 47, Section 5.1: How real is the potential to remove a portion of the building prior to final survey? When would this potential become likely?

RESPONSE

No portion of Building 779, or the 779 Cluster for that matter, will be removed prior to the performance of a survey, commensurate with whether the portion to be removed is being characterized to ensure worker safety, or to meet radiological contamination cleanup criteria or waste characterization requirements. To be more specific, a section of a wall may need to be removed in order to remove a piece of equipment. Generally, this section of wall would not be surveyed to MARRSIM criteria but would be surveyed as part of the waste characterization process.

A phased approach for final survey and demolition will be performed. As decommissioning of portion of a building, or a support facility is completed, and the area/facility is isolated from Cluster related utilities, a final survey, in accordance with MARRSIM, will be performed. Upon successful completion of the final survey, demolition will then be performed.

The sentence in question has been reworded to provide additional clarification.

COMMENT

- 9.) p.51, Section 5.6: Recommend adding a section to address lead based paint release criteria and possible hazardous waste.

RESPONSE

The following information was added to Section 5.6:

TRU, and TRM remediation wastes containing lead, will be packaged for ultimate disposal at WIPP. Remediation hazardous waste or mixed hazardous remediation waste will be disposed of at an approved TSD facility. Hazardous remediation waste characterized as EPA hazardous waste number D008, or mixed hazardous remediation waste will be disposed of at an approved TSD facility. Lead paint contaminated debris that is characterized as industrial waste will be released to either an approved LLW TSD facility or sanitary landfill based on radiological evaluation. In addition, all applicable OSHA requirements regarding worker protection during lead abatement (i.e., removal of lead contaminated paint debris) will adhere to.

COMMENT

- 10.) p.54, Section 7.3.1: Timeframe for development of contractor's training matrix should be included. Is the matrix approved by DOE/K-H as part of the issuance of a contract?

RESPONSE

The training matrix for personnel performing work has been completed and is contained in 779 Cluster HASP. The HASP is reviewed and approved by K-H.

COMMENT

- 11.) p. 67, Section 8.9: In light of previous contamination inside the building as well as outside (5 IHSSs), demolition of this cluster is significant. As a result, the LRA must review and approve the demolition and monitoring plan prior to implementation.

RESPONSE

Those documents for which LRA approval is required, in accordance with RFCA, are identified (reference RESPONSE 2). The demolition plan does not require LRA approval but will be submitted for LRA review.

Air emissions associated with radiological contamination will be contained within the facilities during decommissioning through the existing plenum systems and as these systems are disabled, portable air filtration equipment will be used. Demolition will not be performed on any facility within the 779 Cluster until final surveys have been performed. The final survey is performed to ensure that radiological cleanup criteria are met. Once the cleanup criteria are met, there should be no significant contamination left in the facility. Monitoring of air, water, and ground water during the demolition phase of the project will be performed in accordance with the provisions established in the IA IM/IRA. These provisions are incorporated through reference in the 779 DOP (Section 9, Regulatory and Environmental Considerations).

Much of the area around the 779 Cluster has been paved; for this reason, the project does not believe that there will be significant disturbance of the IHSSs. All appropriate precautions will be taken to ensure minimal disturbance of the IHSSs.

COMMENT

- 12.) p.67, Section 8.10: Has all of the idle equipment been dispositioned? If so, this section should be removed.

RESPONSE

To date, one piece of idle equipment still requires draining. This piece of equipment will be addressed during the performance of fall activities.

COMMENT

- 13.) p.69, Table 8-1: Room classification should include whether a room is considered a Class 1,2,3 or non-impacted area.

RESPONSE

All of the rooms are either Class 1 or 2. Table 8-1 was developed for waste management and not as a final survey tool.

COMMENT

- 14.) p. 75, Section 9.1: Reword the sentence regarding P.E. certification. The GB failed to meet the closure performance std. - the P.E.'s "refusal" to certify clean closure is misleading. Also, what is the schedule for submitting the closure description document for these units?

RESPONSE

The sentence has been deleted.

The closure description document information has been integrated into Section 9 of the DOP; the schedule for closure of the Building 779 RCRA units has been integrated into Attachment 1, 779 Cluster Schedule.

COMMENT

- 15.) p.78, Section 9.2.2: Waste storage - weekly inspections for containers, daily inspections required for tanks.

RESPONSE

Inspections of containers will be performed on a weekly basis. Presently, there are no hazardous remediation waste tanks within the 779 Cluster. In the event that any tanks are used to store hazardous remediation waste, the need for more frequent inspections, such as on a daily basis, will be evaluated.

The language in the DOP, Section 9.2.2, Waste Storage, provides for more frequent inspections with respect to containers and tanks as necessary.

COMMENT

16.) p.91: The closure plan in the Site's RCRA permit should also be considered applicable.

RESPONSE

This information has been integrated.

**Comments on 779 DOP, 10/6/97
Edd Kray, CHPHE**

COMMENT

- 1.) p.1: What are the implications of the basement remaining in-place post decommissioning? Particularly will ground water accumulate and require monitoring and treatment? We have not considered this situation in the previous draft.

RESPONSE

The implications associated with leaving the basement intact are as follows: the area surrounding the basement will require some grading to control runoff and runoff; the area above the basement will be barricaded to eliminate traffic over the basement. A cover will be placed over the basement to protect the area from snow and water buildup. Additional information has been integrated into the engineering section of the DOP to describe the status of the basement.

COMMENT

- 2.) p.3, paragraph 1: Note that the chief toxicity of uranium is attributable not to its radioactive properties but rather to toxic effects upon the kidney. Natural uranium standards are based on these properties rather than radiological effects.

RESPONSE

The correction was made to the uranium contaminant of concern section as provided.

COMMENT

- 3.) p.43: It was unclear to me based on these sections that the RCLR was not completed nor included in the DOP preparation. Please clarify.

RESPONSE

The 779 Cluster RLCR was completed but based on comments received on other demolition project RLCRs, the 779 Cluster RLCR is being revised. The revised RLCR will be transmitted to K-H on November 3, 1997.

COMMENT

- 4.) p. 43: Please include a commitment the independent verification surveys are a requirement and shall be performed.

RESPONSE

The wording has been changed to reflect that independent verification surveys will be performed.

COMMENT

- 5.) p.49, last 2 paragraph: Add reference to the facts that a) 5400 stds are a conservative approach (as compared to a 15 mrem standard), b) regulators have agreed to this approach and c) they are equivalent to industry standards used in the in the private sector.

RESPONSE

EPA regulation 40 CFR 196 has been referenced. Until this regulation is finalized , accepted industry standards for specific residual surface contamination levels which have been agreed to by the LRA will be used. This information has been integrated into the DOP.

COMMENT

- 6.) p.48: Will RFETS claim that any areas of 779 are "non-impacted"?

RESPONSE

No areas within Building 779 are "non-impacted".

COMMENT

- 7.) p.49: The table lists 500 dpm as the total std for transuranics. This is different from RG 1.86 which lists numbers of 100 dpm total and 300 maximum. How will DOE interpret and use this area value. Please explain.

RESPONSE

The table has been amended to reflect the dpm values for transuranics as identified in RG 1.86. The area value of 500 dpm is not applicable for final survey as reflected in the revised table.

COMMENT

- 8.) p.51, 2nd last par: For clarity, provide the full name acronym "SAR".

RESPONSE

The full name for this acronym has been added.

COMMENT

- 9.) p.61,62: Shouldn't the HAs for cutting out gloveboxes and decon work include mention of the potential for radiological releases and potential inhalations? Should there be a block for the HVAC removal work?

RESPONSE

The suggested information has been incorporated into Section 3.0.

COMMENT

10.) p.77: Our air expert suggested minor changes in wording of section 9.2.1. See attached.

RESPONSE

These changes have been integrated as requested.

COMMENT

11.) I still don't see the new NRC decommissioning rule listed as TBC under ARARs.

RESPONSE

On July 21, 1997 the NRC published a final rule governing radiological criteria for license termination. (Reference 20 CFR 20.1401 through 20.1406). The rule provides a 35 mrem/year for unrestricted release and a 100 mrem/year (i.e. institutional controls, financial assurance and 5-year review). In conjunction with the 25 mrem/year unrestricted use criteria, application of ALARA is required. The rule also allows for higher doses called "alternative criteria". The alternative criteria are evaluated on a case by case basis.

The Action Levels for Radionuclide in Soils for the Rocky Flats Cleanup Agreement (ALF), October 1996, represents the current CDPHE, DOE and EPA consensus on the issue of acceptable dose limits for soil. A copy of that document has been incorporated as Appendix L to the Implementation Guidance Document (IGD). In the ALF, the working group evaluated a variety of TBCs (including the proposed NRC release criteria) and determined appropriate dose-based action levels based upon a 15 mrem level for unrestricted use and 85 mrem level for restricted use.

A working group is evaluating the impact of the recently promulgated NRC release criteria, especially how the 25 mrem/ALARA requirement compares to the current 15 mrem value. When the review is complete, the status of the NRC release criteria as ARAR will be determined and incorporated into RFETS decision making. Given the scope of the 779 Cluster project, the outcome of the working group evaluation will not impact the course of the project.

COMMENT

12.) Section 10: This section is still generic in terms of QA and training requirements. The state needs to know who will perform QA inspections and how often QA inspections of work activities will be performed. Adequate training of staff must be guaranteed by specific commitments.

RESPONSE

The project specific training matrix is contained in the project HASP. The implementation of the training matrix requirements is a commitment. There are two QA personnel assigned to the 779 Cluster project; they are B. Bowser and B. Reynolds.

COMMENT

13.) A) p.12: Although DOE may endorse the combination of the OSO and RSO function, this is directly contrary to NRC and State requirements. We discourage this management organization as not providing adequate attention to radiation safety.

B.)p.43: We still do not see adequate detail on glovebox and HVAC removal in the DOP. Any State approval will be contingent on subsequent submission of such detail. Public review will likely object to this lack of detail and hinder the approval process. I strongly recommend enhancement of these portions of the DOP.

RESPONSE

A.) The OSO and RSO functions have been separated. Reference Sections 2.1.4, Radcon Manager, and Section 2.1.5, Occupational Safety Manager.

B.) Additional detail has been added to the DOP regarding glovebox and HVAC information.

779 DOP Comments, 10/21/97
Mark Aguilar, EPA

General Comments

Comment

Add an additional floor plan of all levels and rooms that are associated with 3.1.2., Decommissioning Work Area Description. Is there only two levels to building 779. From the listing of the rooms it seems to only indicate a first and second floor.

Disposition

The addition of a floor plan that identifies the room numbers would result in document reclassification; the document would be considered Unclassified Nuclear Controlled Information "UCNI" and could not be transmitted for public review.

Building 779 has a small basement area in addition to two levels. The basement is described in the 779 DOP but no floor map has been provided.

Comment

There was mentioned at the October 6, 1997, meeting that a new technology container(s) was being considered- Six pack containers, in Appendix B, 1.4 Emerging Technologies there was no mention of these containers—there should be some mention of the possibility of using this technology and what progress has been made and the obstacles to overcome and the benefits to the site.

Disposition

Appendix B, Section 1.4, Emerging Technologies and Appendix B, in general, address decontamination options for use and consideration in the 779 Cluster project rather than waste management specific opportunities.

Any TSDF WAC approved and enhanced waste packaging will be identified in the 779 Waste Management Plan.

Comment

EPA is interested in obtaining copies of work plan type documents, i.e. PEP, RLCR, RSOPs, etc... that are developed with regard to building 779. EPA does not want copies of specific activity base documents like IWCPs. Unless, specifically requested.

Disposition

Copies of these documents will be provided.

Specific Comments

Comment

Table 3-2 on page 37 it discusses the "zero" added beryllium for excess equipment. EPA feels that a more stringent standard be applied to surface contamination. On page 51 a lower limit is being considered - the site might use that as a marketing technique to indicate that a more stringent protocol will be instituted to protect R.F. employees and the surrounding community. When facing the Be in building 779.

Disposition

The project will adhere to the following limits: 25 $\mu\text{g}/\text{ft}^2$ for the surface contamination housekeeping limit, and the 8-hour time-weighted average personnel exposure limit for Be of 2 $\mu\text{g}/\text{m}^3$, with a plant action level of .5 $\mu\text{g}/\text{m}^3$.

Comment

Section 5.0, Page 47: The use of 25 $\mu\text{g}/\text{ft}^2$ is not referenced to the appropriate documents nor is the derivation of this value explained. Since this value is site specific, an explanation or reference to the appropriate documents that derive this value is needed in this Section.

Disposition

Please reference the attached document produced by the Inhalation Toxicology Research Institute (ITRI) entitled *Acceptable Cleanliness Index For Beryllium On Surfaces* to assist in explaining the 25 $\mu\text{g}/\text{ft}^2$ housekeeping limit used throughout the DOE Complex. This document will be references in the DOP.

Comment

Section 5.0, Page 47: Will lead materials be checked for leachability by TCLP methodology? Computer modeling may not be applicable substitute for actual laboratory analysis of materials leachability from building surfaces.

Disposition

Sampling and analysis will be performed on materials coated with lead based paints to determine leachability and the appropriate disposal method. We agree that computer modeling may not be an appropriate substitute for actual analysis; the reference to computer modeling has been deleted from the DOP.

Comment

Section 5.0, Page 47: Within the sentence dealing with "...appropriate dose models.." please include NRC's D and D (interim release 1.0).

Disposition

This reference has been deleted.

Comment

Section 5.1, Page 48: "Non impacted areas": Due to recent events surrounding unknown contamination on trailers not suspected to be contaminated but with contamination present, it is highly recommended that all materials be classified under "Class 3" and eliminate this last classification area. All materials should be construed as being contaminated until proven clean. Even for areas that have no history of contamination potential contamination.

Disposition

All property, equipment and material not meeting the applicable unrestricted release criteria will be disposed of as radioactive waste. Materials will be surveyed in accordance with 4-K62-ROI-03.01, *Performance of Surface Contamination Surveys*, and release in accordance with 1-P73-HSP-18.10 and 4-S23-ROI-03.02, *Radiological Requirements for radioactive Materials and Unrestricted Waste*. In addition, no areas within Building 779 are considered "non-impacted" due to the historical information and available survey data.

All parties involved were extremely concerned when radiological surveys identified the suspected presence of contamination on the 690 Trailers. Samples were taken to identify the nature of the suspected contamination. The radioactive contamination that was identified on the 690 Trailers has been confirmed through analysis as naturally occurring radon daughters. Historical knowledge associated with 690 Cluster was correct in that the trailers were not contaminated with plutonium.

Comment

5.3 Be Release Criteria- last sentence - There is reference to airborne limits. First, the units should be " mg/m^3 " not in " mg/m^2 ". Second, the concentrations listed are not accurate. Second, the concentrations listed are not accurate--- please see the June 1994, NIOSH Pocket Guide to Chemical Hazards. In there they reference the NIOSH and OSHA Exposure Limits.

Disposition

The units identified in the October 1997 779 Cluster DOP are correct.

Comment

5. Section 5.3, Page 51: Use the most current NIOSH, OSHA, ACGIH exposure limits for airborne beryllium. The values listed in this paragraph are erroneous both with the units ($\mu\text{g}/\text{m}^3$ not $\mu\text{g}/\text{m}^2$) as well as the values cited.

Disposition

The units identified in the October 1997 779 Cluster DOP are correct.

Comment

8.7 Waste Management Strategy 3rd paragraph, first bullet- this bullet need to indicated that swipes were taken during reconnaissance level characterization and from that data the rooms are considered non-contaminated and therefore suitable for dispositioning.

Disposition

The statement in the document is correct. Swipes were not taken in rooms that were not posted as radiologically contaminated, such as offices, during the reconnaissance level characterization. Routine radiological surveys are performed throughout the 779 Cluster in accordance with Radcon requirements.

Comment

Section 8.9, Page 67: Will the PCB contaminated soils be analyzed for radiological contamination (i.e. mixed waste)?

Disposition

The project does not anticipate sampling any PCB contaminated soil for radiological contamination. Soil sampling and any resulting remediation will be performed as an environmental remediation function.

Comment

9.1.1 RCRA Closure Requirements under TRU Mixed Waste - There is reference to the one gram standard – Does this mean that no more than one gram of Pu can be associated with a RCRA unit? Not matter what the size or is there a weight per unit volume associated with the one gram standard?

Disposition

No, this statement was an error and will be corrected to read 100 nCi/g.

Comment

Appendix B page B-8, last para - first sentence - the would “should” needs to be replaced with the “will”.

Disposition

Corrected